<u>REMARKS/ARGUMENTS</u>

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1-60 are pending in this case. Claims 1, 2, 5, 7, 9-13, 16, 18, 20-25, 28, 30, 32-48, and 50-59 are amended and Claim 60 is added by the present amendment. Amended Claims 1, 2, 5, 7, 9-13, 16, 18, 20-25, 28, 30, 32-48, and 50-59 and new Claim 60 are supported by the original disclosure and, thus, add no new subject matter.

The outstanding Office Action rejected Claims 1-59 under 35 U.S.C. § 102(e) as being anticipated by <u>Moshfeghi</u> (U.S. Patent No. 6,476,833).

Applicant respectfully traverses the rejection.

Amended Claim 1 is directed to a Web page creation apparatus and recites, *inter alia*, a Web page creation unit configured to create a Web page having operation items based on a device that displays the Web page.

<u>Moshfeghi</u> describes a client-server application including a browser window. The embedded browser functionality available through the selected websites is limited based on user authorization and preference.

<u>Moshfeghi</u> does not teach or suggest creating a Web page with operation items that are based the device that displays the Web page.

Because <u>Moshfeghi</u> does not include all the limitations of Claim 1, Applicant respectfully requests that the rejection under 35 U.S.C. § 102(e) of Claim 1 and all claims dependent therefrom be withdrawn.

Amended Claim 11 is directed to a Web page creation apparatus and recites:

> a Web page creation unit configured to create a Web
> page having operation items corresponding to functions of an
> external device; and
> an inquiry unit configured to transmit an inquiry about
> usable functions of the external device to the external device,

wherein the Web page creation unit is configured to
create the Web page based on both operation-item display
information, which indicates the operation items to be
displayed and which is defined based on a device that displays
the Web page or on a user of the device, and usable function
identification information, which is received from the external
device in response to the inquiry of the inquiry unit and
indicates the usable functions of the external device, so that
only the operation items corresponding to the usable functions
of the external device are displayed.

Moshfeghi describes a method and apparatus for determining whether and how much

to restrict embedded browser functionality based on the user. The portions of Moshfeghi

cited in the outstanding Office Action also describe restricting access to business-server

objects based on the user's authorization by intercepting and verifying requests from the

client applications to the business-server objects.[1]

Moshfeghi does not teach or suggest an inquiry unit configured to transmit an inquiry

from the Web page creation apparatus to an external device inquiring about usable functions

of the external device. Moshfeghi also does not teach or suggest a Web page creation unit

configured to display only those operation items that correspond with usable functions of the

external device.

Because Moshfeghi does not include all the limitations of Claim 11, Applicant

respectfully requests that the rejection under 35 U.S.C. § 102(e) of Claim 11 and all claims

dependent therefrom be withdrawn.

Claims 23-36 were rejected under similar rationale as Claims 1-22 and are asserted in

the outstanding Office Action as reciting a similar apparatus.[2]

Thus, Applicant respectfully asserts that Claim 23 and all claims dependent therefrom

are patentable for at least the reasons discussed above with respect to Claims 1 and 11.

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[1] *See* Moshfeghi at column 8, lines 58-66 cited in the outstanding Office Action at page 7.
[2] *See* outstanding Office Action at page 10.

Further, Claim 23 includes a permitted-function inquiry unit configured to transmit an inquiry about allowability of execution of a function to each of the external devices and recites a Web page creation unit that displays only the operation items corresponding to the permitted functions of the external devices.

As discussed above, Moshfeghi describes intercepting requests from client applications to business-server objects to verify user authorization.

Moshfeghi does not teach or suggest a permitted-function inquiry unit configured to transmit a request for allowability information to each external device and displaying only the operation items indicated as allowable by the external devices.

Because Moshfeghi does not include all the limitations of Claim 23, Applicant respectfully requests that the rejection under 35 U.S.C. § 102(e) of Claim 23 and all claims dependent therefrom be withdrawn.

Claims 37-50 were rejected under similar rationale as Claims 1-22 and are asserted in the outstanding Office Action as reciting "method claims used in performing similar steps as those claimed in 1-22."[3]

Thus, Applicant respectfully asserts that Claims 37, 41, and 45, and all claims dependent therefrom, are patentable for at least the reasons discussed above with respect to Claims 1 and 11.

Further, Claim 37 is directed to a method of controlling Web page creation and includes creating the operation items in the Web page according to the first style information.

Moshfeghi does not teach or suggest this element of Claim 37.

Claims 41 and 45 are directed to a method of controlling Web page creation and recite and include similar elements to those of Claims 11 and 23.

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[3] *See* outstanding Office Action at page 10.

As discussed above, <u>Moshfeghi</u> does not teach or suggest the elements of the apparatus recited in Claims 11 and 23. Thus, Moshfeghi also does not teach or suggest the elements of the method recited in Claims 41 and 45.

Because <u>Moshfeghi</u> does not include all the limitations of Claims 37, 41, and 45, Applicant respectfully requests that the rejection under 35 U.S.C. § 102(e) of Claims 37, 41, and 45, and all claims dependent therefrom, be withdrawn.

Claims 51-59 were rejected under similar rationale as Claims 1-22 and are asserted in the outstanding Office Action as reciting "computer program product claims used in performing similar steps as those claimed in 1-22."[4]

Thus, Applicant respectfully asserts that Claims 51, 53, 55, and 57-59, and all claims dependent therefrom, are patentable for at least the reasons discussed above with respect to Claims 1 and 11.

Further, Claims 57 and 58 are directed to an information processing device comprising a Web page creation unit that recites similar elements to those of Claims 11 and 23, respectively.

Claim 59 is directed to a Web page creation apparatus and includes a first storage unit configured to manage common information and a second storage unit configured to manage individual information.

<u>Moshfeghi</u> describes a user profile database that includes information for each user.

<u>Moshfeghi</u> does not teach or suggest storage of common information defined in common for two or more users to indicate operation items to be displayed and storage of individual information regarding the common operation items not available to an individual user.

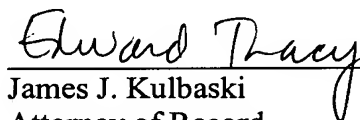
[4] *See* outstanding Office Action at page 11.

Because <u>Moshfeghi</u> does not include all the limitations of Claims 51, 53, 55, and 57-59, Applicant respectfully requests that the rejection under 35 U.S.C. § 102(e) of Claims 51, 53, 55, and 57-59, and all claims dependent therefrom, be withdrawn.

New Claim 60 is supported in the original disclosure.[5] Claim 60 depends from Claim 1, and is, thus, patentable for the reasons discussed above with respect to Claim 1.

Accordingly, the outstanding rejections are traversed and the pending claims are believed to be in condition for formal allowance. An early and favorable action to that effect is, therefore, respectfully requested.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, P.C. ·

Edward Tracy

James J. Kulbaski
Attorney of Record
Registration No. 34,648

Edward W. Tracy, Jr.
Registration No. 47,998

Customer Number
22850

Tel: (703) 413-3000
Fax: (703) 413 -2220
(OSMMN 06/04)

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[5] *See* Specification at page 25, lines 22-25.